



Number: D95-13

Serving the People of California

DIRECTIVE

Date: August 31, 1995

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TO: SERVICE DELIVERY AREA ADMINISTRATORS
PRIVATE INDUSTRY COUNCIL CHAIRPERSONS
JTPD PROGRAM OPERATORS
EDD JOB SERVICE OFFICE MANAGERS
JTPD STAFF

SUBJECT: GAIN ASSESSMENT AND EMPLOYABILITY PLAN RESULTS TO
MEET NEW TITLE II CASE MANAGEMENT REQUIREMENTS

EXECUTIVE SUMMARY:

Purpose:

This directive establishes policy on using available Greater Avenues for Independence (GAIN) program assessment and employability plan information to fulfill the new Job Training Partnership Act (JTPA) title II case management requirements.

Scope:

The guidance in this Directive applies specifically to participants served in activities funded with JTPA Title II 8 percent/50 percent funds. At a Service Delivery Area's (SDA) discretion, this guidance may be applied to similar combined JTPA/GAIN service delivery efforts that meet the same general conditions, requirements, and policy objectives referenced in this Directive.

Effective Date:

This Directive is effective on issuance.

REFERENCES

- JTPA §204(a)(1)(A) and §264(b)(1)(A)
- JTPA Final Rule, Title 20 Code of Federal Regulations (CFR) 628.515
- Department of Labor (DOL) Training and Employment Guidance Letter 7-92, dated March 8, 1993, Item 5.b (JTPA Amendment Alert 17)
- JTPA Regional Bulletin 25-93, Addendum 2, dated July 22, 1993 (JTPA Amendment Alert 37)
- DOL Training and Employment Information Notice 18-93, dated September 23, 1993 (JTPA Amendment Alert 37)

- Family Economic Security Act (FESA), as amended October 2, 1993, California Unemployment Insurance Code (CUIC) §15021 and §15070

STATE-IMPOSED REQUIREMENTS:

This Directive contains state-imposed requirements which are printed in **bold**, *italic* type.

FILING INSTRUCTIONS:

This Directive supersedes JTPA Interim directive 94-01, dated January 24, 1994.

BACKGROUND:

In California, 50 percent of the Statewide Education Coordination and Grants (SECG) 8 percent funds are dedicated to providing adult literacy and lifelong learning opportunities for participants in the GAIN program (Note: GAIN is California's Job Opportunities and Basic Skills Training [JOBS] program). These opportunities are provided to GAIN participants almost exclusively in the form of basic educational services consisting of adult basic education instruction, General Educational Development (GED) preparation, and English as a Second Language (ESL) instruction. Job-specific training, if provided concurrently with these educational services, can also be funded. Fifty percent funds are allocated by formula to SDAs for purposes of providing these GAIN-related services.

The Job Training Reform Amendments of 1992 initiated various changes which impact combined JTPA/GAIN service delivery efforts. The most significant change mandates these programs to ensure coordination and avoid duplication, and implements initial service planning requirements for all JTPA Title II participants-objective assessment and development of an Individual Service Strategy (ISS). These requirements parallel those outlined in the GAIN program. In GAIN, participants are required to receive an initial assessment, consisting of the GAIN Appraisal results and other related information, that is equivalent to the objective assessment in JTPA. The GAIN initial assessment provides the basis for a preliminary employability plan that contains essentially the same information as the ISS.

Regardless of the respective program element label, the JTPA and GAIN programs share a common operational framework. Specifically, both of these service planning efforts are participant-centered and involve an ongoing process that ends only when the person terminates his/her involvement with the JTPA/GAIN programs. Once these participants terminate from 8 percent/50 percent status, they revert to GAIN-only participant status unless future collaborative strategies are developed.

POLICY AND PROCEDURES:

A. General

Available GAIN initial assessment results will be used to meet any and/or all objective assessment requirements for participants being served under a combined JTPA/GAIN 8 percent/50 percent funded service delivery effort.

This policy establishes, for 8 percent/50 percent purposes, a collaborative case management strategy that recognizes the GAIN program as the lead partner with JTPA and its educational partners fulfilling secondary, albeit significant, roles. For this joint training effort, only enough information is needed to ensure appropriate assignment to a basic educational activity. The SDAs must avoid needless duplication of assessment results and obtain additional assessment data only if specific information is not available, reliable, or current.

The objective of this policy is to encourage development of common assessments and ultimately result in combined service delivery efforts. These should be efficiently developed, from both financial and human investment perspectives, and acceptable to both programs. We support a consolidated, seamless case management effort that minimizes duplication and serves the best interests of the individual participant.

B. Operational Procedures

The following procedures must be followed by SDAs to comply with the requirements of this directive:

1. The SDAs must ensure that adequate assessment and employability planning information (comparable to the ISS) exists for all referrals from GAIN for enrollment in 8 percent/50 percent activities. This information, consisting of the GAIN Appraisal results and other related information, must be complete, reliable, and current. Completeness is determined by whether enough information is available to substantiate why the basic educational activity is the appropriate assignment. Current assessment information is defined as information obtained or compiled within 12 months of referral to the SDA.
2. The SDAs may, at their discretion, require their GAIN offices to either provide copies of all relevant assessment/ISS-related information with their participant referrals or an assurance that this information is readily available for review as needed by the SDA or other authorized party, e.g., Employment Development Department, DOL. Should an SDA choose the latter option, we recommend that a specific referral instrument be used and that these arrangements be referenced in any applicable coordination agreement(s) between the SDA and the respective GAIN office(s).
3. The SDAs are authorized to engage in additional assessment-related activities for 8 percent/50 percent participants if specific needed information is not available, reliable, or current. Additional employability planning information resulting from these activities shall become part of the consolidated case management information available for use by either JTPA or GAIN in planning future intervention strategies.

ACTION:

Please review your SDA's intake and enrollment procedures for 8 percent/50percent participants to ensure compliance with this Directive.

INQUIRIES:

If you have any questions regarding this Directive, please direct them to Georganne Pintar at (916) 654-8498.

/S/ KATHY SAGE
Chief